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7 Attorney for Dannie Alton Luckett

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 DANNIE ALTON LUCKETT,  
15 Defendant.

Case No. 2:16-cr-00212-GMN-NJK

**MOTION FOR THE PREPARATION**  
**OF A PRE-PLEA PRESENTENCE**  
**REPORT**

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17 The defendant, Dannie Alton Luckett, by and through his counsel of record, Rachel  
18 Korenblat, Assistant Federal Public Defender, files this Motion for the Preparation of a Pre-  
19 Plea Presentence Report. This Motion is based upon the attached Memorandum of Points and  
20 Authorities, and all papers and pleadings filed herein.

21 DATED this 19th day of August, 2016.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/ Rachel Korenblat  
25 RACHEL KORENBLAT  
Assistant Federal Public Defender  
Attorney for Dannie Alton Luckett  
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**POINTS AND AUTHORITIES**

On July 13, 2016, the grand jury in the District of Nevada charged Mr. Luckett in an Indictment with Bank Robbery, in violation of 18 U.S.C. § 2113(a). (ECF No. 9.) Based on the defense's review of Mr. Luckett's criminal record, there is a concern that he may qualify as a career offender, which would cause him to face a significant amount of custodial time.

To satisfy Mr. Luckett's concerns and to assure that he has the information he needs to make a truly knowing and intelligent decision about how to proceed with his case, he respectfully requests that the United States Probation Office ("Probation") complete a Pre-Plea Presentence Report ("PSR") to determine if his prior convictions trigger the career offender provisions in the Sentencing Guidelines.

**CONCLUSION**

Based on the above, Mr. Luckett respectfully that this Honorable Court enter an Order directing Probation to prepare a Pre-Plea PSR to determine Mr. Luckett's criminal history and opine as to whether Probation believes he qualifies as a career offender.

Dated this 19th day of August, 2016

Respectfully submitted,  
RENE L. VALLADARES  
Federal Public Defender

By: /s/ Rachel Korenblat

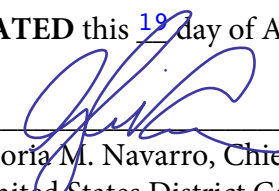
RACHEL KORENBLAT  
Assistant Federal Public Defender  
Attorney for Dannie Alton Luckett

**ORDER**

**IT IS HEREBY ORDERED** that Defendant Dannie Alton Luckett's Motion for a Pre-Plea Presentence Report (ECF No. 15) is **GRANTED**.

**IT IS FURTHER ORDERED** that the United States Probation Office shall prepare and provide to the Court by October 21, 2016, a Pre-Plea Presentence Report with the guideline calculation requested for Defendant's **criminal history only**.

**DATED** this 19<sup>th</sup> day of August, 2016.

  
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Gloria M. Navarro, Chief Judge  
United States District Court

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on August 19, 2016, he served an electronic copy of the above and foregoing **MOTION FOR THE PREPARATION OF A PRE-PLEA PRESENTENCE REPORT (PSR)** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
SUSAN CUSHMAN  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/ Karen Meyer

Employee of the Federal Public Defender